

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

1. DARREN FRANKLIN,
a/k/a "D," and

2. ROLAND WORRELL,

Defendants.

) CRIMINAL NO.

)

) VIOLATIONS:

)

) 21 U.S.C. § 841(a)(1) --

) Distribution of Cocaine
Base

)

) 18 U.S.C. § 2 --

) Aiding and Abetting

)

) 21 U.S.C. § 860(a) - School

) Zone Violation

)

04 CR 10117 RWZ

INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine
Base; 21 U.S.C. § 860(a) -- School Zone Violation)

The Grand Jury charges that:

On or about May 8, 2003, at Boston, in the District of
Massachusetts,

1. DARREN FRANKLIN, a/k/a "D",
defendant herein, did knowingly and intentionally possess with
intent to distribute, and did distribute, a quantity of cocaine
base, also known as "crack," a Schedule II controlled substance,
within 1,000 feet of the real property comprising the George A.
Lewis School, a public middle school.

The Grand Jury further charges that the offense involved 5
grams or more of a mixture or substance containing a detectable
amount of cocaine base, also known as "crack." Accordingly, 21
U.S.C. § 841(b)(1)(B)(iii) is applicable to this offense.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- School Zone Violation; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about July 10, 2003, at Boston, in the District of Massachusetts,

1. DARREN FRANKLIN, a/k/a "D" and
2. ROLAND WORRELL,

defendants herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the George A. Lewis School, a public middle school.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

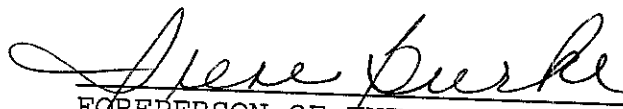
On or about March 12, 2004, at Randolph, in the District of Massachusetts,

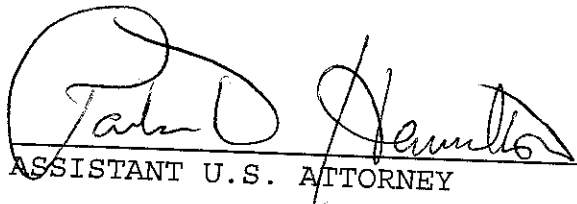
1. DARREN FRANKLIN, a/k/a "D",
defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance.

The Grand Jury further charges that the offense involved 5 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as "crack." Accordingly, 21 U.S.C. §§ 841(b)(1)(B)(iii) is applicable to this offense.

All in violation of Title 21, United States Code, Section 841(a)(1).

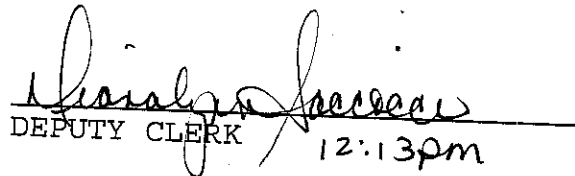
A TRUE BILL


FOREPERSON OF THE GRAND JURY


ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS: April 14, 2004

Returned into the District Court by the Grand Jurors and
filed.


DEPUTY CLERK 12:13pm